

THOMPSON HINE LLP
J. Timothy McDonald, Esq.
New Jersey Bar No. 027201990
Two Alliance Center
3560 Lenox Road, Suite 1600
Atlanta, Georgia 30326
Phone: 404.541.2900
Fax: 404.541.2906
Tim.McDonald@ThompsonHine.com

*Counsel for Defendant
Fortnoff Financial, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, as assignee of
individuals who are Covered Persons,
JANE DOE-1, a law enforcement officer,
JANE DOE-2, a law enforcement
officer, EDWIN MALDONADO,
SCOTT MALONEY, JUSTYNA
MALONEY, PATRICK COLLIGAN,
and WILLIAM SULLIVAN,

Plaintiffs,

vs.

FORTNOFF FINANCIAL, LLC,
RICHARD ROES 1-10, fictitious names
of unknown individuals and ABC
COMPANIES 1-10, fictitious names of
unknown entities,

Defendants.

Civil Action No. 1:24-cv-04390-HB

**JOINT MOTION TO STAY ALL
DEADLINES**

Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, and William Sullivan (“Plaintiffs”) and Defendant Fortnoff Financial, LLC (“Defendant”) by and through their undersigned counsel and subject to the approval of this Court, hereby files this Unopposed Motion to Stay all Deadlines, and in support thereof, respectfully shows the Court as follows:

All matters in controversy between Plaintiffs and Defendant (jointly, the “Parties”) have been settled, or are otherwise close to being settled, in principle. The Parties are in the process of memorializing the terms of a written settlement agreement. The Parties anticipate that they will be able to perform such terms within sixty (60) days. Accordingly, the Parties respectfully request that the Court grant a stay of the deadline to respond to the Complaint from March 18, 2025 (Dkt. No. 49 at Page ID 1082) proceedings between the parties until May 19, 2025.

The Parties agree that should settlement not be achieved by May 19, 2025, nothing shall bar Defendant from filing a responsive pleading in this matter, including, but not limited to the pre-trial motions addressed in the Court’s Order of January 22, 2025. (Id.)

Good cause exists for granting this Joint Motion, as set forth above. The Motion is not filed for purposes of delay, but so that justice may be served.

WHEREFORE, Plaintiff and Defendant pray that this Honorable Court will grant their Joint Motion to Stay All Deadlines and stay Defendant's time to respond to the Complaint in this matter until May 19, 2025.

Respectfully submitted this 12th day of March, 2025.

PEM LAW LLP

/s/ Rajiv D. Parikh

Rajiv D. Parikh
Kathleen Barnett Einhorn
1 Boland Drive, Suite 101
West Orange, New Jersey 07052
RParikh@PemLawFirm.com
KEinhorn@PemLawFirm.com

THOMPSON HINE LLP

/s/ J. Timothy McDonald

J. Timothy McDonald
Two Alliance Center
3560 Lenox Road, Suite 1600
Atlanta, Georgia 30326
Phone: 404.541.2906
Fax: 404.541.2906
Tim.McDonald@ThompsonHine.com

Steven G. Stransky
3900 Key Center
127 Public Square
Cleveland, Ohio 44114
Phone: 216.566.5500
Fax: 216.566.5800
Steve.Stransky@ThompsonHine.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 12, 2025 to all counsel of record who is deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ J. Timothy McDonald

J. Timothy McDonald (ID No. 027201990)